

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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TZVI WEISS, et al., :  
Plaintiffs, : Case No. 05-cv-4622 (DLI) (MDG)  
- against - :  
NATIONAL WESTMINSTER BANK PLC, :  
Defendant. :  
-----X  
NATAN APPLEBAUM, et al., :  
Plaintiffs, :  
- against - : Case No. 07-cv-916 (DLI) (MDG)  
NATIONAL WESTMINSTER BANK PLC, : **Oral Argument Requested**  
Defendant. :  
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**DECLARATION OF VALERIE SCHUSTER IN SUPPORT OF THE MOTION FOR  
SUMMARY JUDGMENT BY NATIONAL WESTMINSTER BANK PLC**

Valerie Schuster declares as follows:

1. I am an attorney admitted to practice before this Court and an associate at Cleary Gottlieb Steen & Hamilton LLP, counsel to Defendant National Westminster Bank Plc ("NatWest"). I submit this declaration in support of NatWest's motion for summary judgment. Submitted with this declaration, in seven volumes, are true and correct copies of the following documents, which are cited in National Westminster Bank Plc's Statement of Material Facts As To Which There Is No Genuine Issue Pursuant To Local Civil Rule 56.1.<sup>1</sup>

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<sup>1</sup> The abbreviated reference that appears in parentheses after each exhibit denotes how the exhibit is identified in NatWest's Rule 56.1 Statement.

EXHIBIT 1: Declaration of Guy Cole, dated Nov. 23, 2011 (Cole Dec.).

EXHIBIT 2: Declaration of Jason A. Novak, dated December 2, 2011 (“Novak NW Dec.”).

EXHIBIT 3: NW008300-55.

EXHIBIT 4: <http://www.interpal.org.uk/en/about-us>.

EXHIBIT 5: NW068714-16.

EXHIBIT 6: March 2, 2011 Expert Report of Michael Hyland (“Hyland Rep.”).

EXHIBIT 7: Excerpts from the July 21, 2010 deposition of Tony O’Hear (“O’Hear Tr.”).

EXHIBIT 8: Excerpts from the July 12, 2010 deposition of Douglas Hartley (“Hartley Tr.”).

EXHIBIT 9: Excerpts from the June 8, 2010 deposition of Guy Cole (“Cole Tr.”).

EXHIBIT 10: Excerpts from the July 14, 2010 deposition of Michael Hoseason (“Hoseason 7/14/2010 Tr.”).

EXHIBIT 11: Excerpts from the May 20, 2009 deposition of Fleur Baugh (“Baugh Tr.”).

EXHIBIT 12: Excerpts from the July 22, 2010 deposition of Irvine Rodger (“Rodger Tr.”).

EXHIBIT 13: Excerpts from the July 23, 2010 deposition of Amanda Holt (“Holt Tr.”).

EXHIBIT 14: December 6, 2010 Expert Report of Jon Holland (“Holland Rep.”).

EXHIBIT 15: March 3, 2011 Expert Report of Clive Walker (“Walker Rep.”).

EXHIBIT 16: Excerpts from the June 14, 2011 deposition of Clive Walker (“Walker Tr.”).

EXHIBIT 17: December 3, 2010 Expert Report of Jonathan Burchfield (“Burchfield Rep.”).

EXHIBIT 18: March 1, 2011 Second Expert Report of Jonathan Burchfield (“Burchfield Reb. Rep.”).

EXHIBIT 19: NW068887.

EXHIBIT 20: NW053453-56.

EXHIBIT 21: NW068708-09.

EXHIBIT 22: “MI5 study ‘charity cash link to Hamas’,” London Times, March 6, 1996.

EXHIBIT 23: NW014516.

EXHIBIT 24: Excerpts from the May 20, 2011 deposition of Jonathan Burchfield (“Burchfield Tr.”).

EXHIBIT 25: W\_S081305-29.

EXHIBIT 26: Excerpts from the July 15, 2010 deposition of Michael Hoseason (“Hoseason 7/15/2010 Tr.”).

EXHIBIT 27: NW212124.

EXHIBIT 28: Exhibit 11 to the July 14, 2010 deposition of Michael Hoseason (“Hoseason Dep. Ex. 11”).

EXHIBIT 29: NW052056-66.

EXHIBIT 30: Excerpt from “Reporters’ Roundtable: Can You Trust WikiLeaks?” CNET, Oct. 29, 2010, [http://www.cnet.com/8301-30976\\_1-20021253-10348864.html](http://www.cnet.com/8301-30976_1-20021253-10348864.html), at 10:10-11:47.

EXHIBIT 31: “Report: Top international administrator in Bosnia was a British secret service agent,” AP Worldstream, September 1, 2005.

EXHIBIT 32: NW052067-73.

EXHIBIT 33: Excerpts from the May 21, 2009 deposition of Olha Leeming (“Leeming Tr.”).

EXHIBIT 34: NW013335.

EXHIBIT 35: NW012954.

EXHIBIT 36: NW068905-06.

EXHIBIT 37: Excerpts from the June 24, 2008 deposition of Belinda Lane (“Lane 6/24/2008 Tr.”).

EXHIBIT 38: Excerpts from the June 25, 2008 deposition of Belinda Lane (“Lane 6/25/2008 Tr.”).

EXHIBIT 39: NW052074-91.

EXHIBIT 40: “jihad,” Oxford Dictionaries Pro. (Oxford University Press April 2010), <http://oxforddictionaries.com/definition/jihad?region=us>.

EXHIBIT 41: Excerpt from Maneka Gandhi & Ozair Husain, The Complete Book of Muslim and Parsi Names (1994).

EXHIBIT 42: Excerpts from the October 22, 2010 deposition of Timur Kuran in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) (“Kuran CL Tr.”).

EXHIBIT 43: Excerpts from the October 5, 2010 deposition of Charlotte McComas (“McComas Tr.”).

EXHIBIT 44: NW012952.

EXHIBIT 45: NW068227-34.

EXHIBIT 46: NW013699.

EXHIBIT 47: NW068903.

EXHIBIT 48: NW083859-62.

EXHIBIT 49: NW052105-13.

EXHIBIT 50: NW013660-61.

EXHIBIT 51: NW013659.

EXHIBIT 52: NW013033-35.

EXHIBIT 53: NW052114-23.

EXHIBIT 54: NW013052.

EXHIBIT 55: NW013707.

EXHIBIT 56: NW013708.

EXHIBIT 57: NW052574.

EXHIBIT 58: NW067972-74.

EXHIBIT 59: NW068036-38.

EXHIBIT 60: NW068053.

EXHIBIT 61: NW068056.

EXHIBIT 62: NW012976.

EXHIBIT 63: Exhibit 46 to the October 4, 2010 deposition of Terry Woodley (“Woodley Dep. Ex. 46”).

EXHIBIT 64: Exhibit 47 to the October 4, 2010 deposition of Terry Woodley (“Woodley Dep. Ex. 47”).

EXHIBIT 65: Excerpts from the October 4, 2010 deposition of Terry Woodley (“Woodley Tr.”).

EXHIBIT 66: Report of the Charity Commission’s 2003 Inquiry on Interpal.

EXHIBIT 67: NW012942.

EXHIBIT 68: NW012943-45.

EXHIBIT 69: NW013641-44.

EXHIBIT 70: NW013701.

EXHIBIT 71: NW013702.

EXHIBIT 72: NW013703.

EXHIBIT 73: NW013944-45.

EXHIBIT 74: NW013946-47.

EXHIBIT 75: NW013674-77.

EXHIBIT 76: NW014505.

EXHIBIT 77: NW014506.

EXHIBIT 78: NW016767-74.

EXHIBIT 79: NW066721-23.

EXHIBIT 80: NW066740-42.

EXHIBIT 81: Excerpts from the July 16, 2010 deposition of Stephen Foster (“Foster Tr.”).

EXHIBIT 82: NW066667-71.

EXHIBIT 83: NW066672-76.

EXHIBIT 84: NW066677-81.

EXHIBIT 85: NW066691-95.

EXHIBIT 86: NW066807-13.

EXHIBIT 87: NW066820-21.

EXHIBIT 88: NW066844-46.

EXHIBIT 89: NW066847-52.

EXHIBIT 90: NW066696-700.

EXHIBIT 91: NW066788-94.

EXHIBIT 92: NW066701-04.

EXHIBIT 93: NW066705-11.

EXHIBIT 94: NW066712-16.

EXHIBIT 95: <http://www.treasury.gov/resource-center/sanctions/Programs/Documents/terror.pdf>.

EXHIBIT 96: Exhibit 25 to the July 15, 2010 deposition of Michael Hoseason (“Hoseason Dep. Ex 25”).

EXHIBIT 97: Excerpts from the July 13, 2010 deposition of Neil Trantum (“Trantum Tr.”).

EXHIBIT 98: NW000084-111.

EXHIBIT 99: NW000112-43.

EXHIBIT 100: NW196319-58.

EXHIBIT 101: NW212047-73.

EXHIBIT 102: Excerpts from the June 23, 2008 deposition of Ian Wickens (“Wickens Tr.”).

EXHIBIT 103: March 2, 2011 Expert Report of John Barker (“Barker Rep.”).

EXHIBIT 104: “Britain rejects Bush’s charges against charity,” The Daily Telegraph, September 25, 2003.

EXHIBIT 105: Plaintiffs’ Second Supplemental Responses and Objections to NW’s Contention Interrogatories, dated October 13, 2011 (“Plaintiffs’ Second Supp’l Resp. to Cont. Interrog.”).

EXHIBIT 106: Lord Chalfont - Interpal: Charitable Status, HL Deb, 6 Oct. 2003, vol 653, col18, available at [http://www.publications.parliament.uk/pa/ld200203/ldhansrd/vo031006/text/31006-05.htm#31006-05\\_spopq0](http://www.publications.parliament.uk/pa/ld200203/ldhansrd/vo031006/text/31006-05.htm#31006-05_spopq0).

EXHIBIT 107: Supplementary memorandum submitted by Oxfam to the House of Commons Select Committee on International Development, 19 Nov. 2003, available at <http://www.publications.parliament.uk/pa/cm200304/cmselect/cmintdev/230/230we35.htm>.

EXHIBIT 108: Hamas/Interpal, HC Deb, 16 Jan. 2006, vol 441, col976W, available at [http://www.publications.parliament.uk/pa/cm200506/cmhansrd/vo060116/text/60116w26.htm#60116w26.html\\_sbhd3](http://www.publications.parliament.uk/pa/cm200506/cmhansrd/vo060116/text/60116w26.htm#60116w26.html_sbhd3).

EXHIBIT 109: Interpal, HC Deb, 6 Feb. 2006, vol 442, col772W, available at [http://www.publications.parliament.uk/pa/cm200506/cmhansrd/vo060206/text/60206w03.htm#60206w03.html\\_sbhd2](http://www.publications.parliament.uk/pa/cm200506/cmhansrd/vo060206/text/60206w03.htm#60206w03.html_sbhd2).

EXHIBIT 110: Banking: Interpal, 708 H.L. 2 Mar. 2009, col. WA115, available at <http://www.publications.parliament.uk/pa/ld200809/ldhansrd/text/90302w0001.htm#09030220000187>.

EXHIBIT 111: Exhibit 19 to the June 14, 2011 deposition of Clive Walker (“Walker Dep. Ex. 19”).

EXHIBIT 112: Exhibit 20 to the June 14, 2011 deposition of Clive Walker (“Walker Dep. Ex. 20”).

EXHIBIT 113: Interpal, HC Deb, 15 July 2009, vol 496, col481W, available at <http://www.publications.parliament.uk/pa/cm200809/cmhansrd/cm090715/text/90715w0024.htm#09071590003305>.

EXHIBIT 114: Exhibit 21 to the June 14, 2011 deposition of Clive Walker (“Walker Dep. Ex. 21”).

EXHIBIT 115: Union of Good, HC Deb, 6 Apr 2010, vol 508, col1224W, available at <http://www.publications.parliament.uk/pa/cm200910/cmhansrd/cm100406/text/100406w0017.htm>.

EXHIBIT 116: Plaintiffs’ Responses and Objections to NW’s Contention Interrogatories, dated July 5, 2011 (Plaintiffs’ Resp. to Cont. Interrog.).

EXHIBIT 117: December 27, 2010 Expert Report of Yaron Lipsches (“Lipsches Rep.”).

EXHIBIT 118: Exhibit 11 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 11”).

EXHIBIT 119: Excerpts from the June 8, 2011 deposition of Gary Walters (“Walters Tr.”).

EXHIBIT 120: Exhibit 10 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 10”).

EXHIBIT 121: March 4, 2011 Rebuttal Report of Expert Witness Gary Walters (“Walters Reb. Rep.”)

EXHIBIT 122: Exhibit 43 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 43”).

EXHIBIT 123: Exhibit 23 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 23”).

EXHIBIT 124: Exhibit 29 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 29”).

EXHIBIT 125: Exhibit 30 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 30”).

EXHIBIT 126: Exhibit 38 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 38”).

EXHIBIT 127: Exhibit 39 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 39”).

EXHIBIT 128: Exhibit 40 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 40”).

EXHIBIT 129: Exhibit 31 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 31”).

EXHIBIT 130: Exhibit 42 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 42”).

EXHIBIT 131: Exhibit 17 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 17”).

EXHIBIT 132: Exhibit 32 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 32”).

EXHIBIT 133: Exhibit 33 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 33”).

EXHIBIT 134: Exhibit 35 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 35”).

EXHIBIT 135: Exhibit 27 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 27”).

EXHIBIT 136: Exhibit 28 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 28”).

EXHIBIT 137: Exhibit 37 to the June 8, 2011 deposition of Gary Walters (“Walters Dep. Ex. 37”).

EXHIBIT 138: Exhibit 27 to the June 14, 2010 deposition of Clive Walker (“Walker Dep. Ex. 27”).

EXHIBIT 139: WALKER000007-11.

EXHIBIT 140: WALKER000012-15.

EXHIBIT 141: Peter Edge, "Hard Law and Soft Power: Counter-Terrorism, the Power of Sacred Places, and the Establishment of an Anglican Islam," 12 Rutgers J.L. & Relig. 358 (2010).

EXHIBIT 142: Exhibit 15 to the June 14, 2010 deposition of Clive Walker ("Walker Dep. Ex. 15").

EXHIBIT 143: Exhibit 16 to the June 14, 2010 deposition of Clive Walker ("Walker Dep. Ex. 16").

EXHIBIT 144: November 19, 2009 Expert Report of Wayne Geisser ("Geisser 2009 Rep.").

EXHIBIT 145: Exhibit C to the November 19, 2009 Expert Report of Wayne Geisser ("Geisser 2009 Rep., Ex. C").

EXHIBIT 146: Exhibit D to the November 19, 2009 Expert Report of Wayne Geisser ("Geisser 2009 Rep., Ex. D").

EXHIBIT 147: December 28, 2010 Expert Report of Wayne Geisser ("Geisser 2010 Rep.").

EXHIBIT 148: Excerpts from the June 2, 2011 deposition of Dr. Matthew Levitt ("Levitt NW Tr.").

EXHIBIT 149: Excerpts from the September 1, 2010 deposition of Dr. Matthew Levitt in Strauss, et al. v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf, et al. v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Levitt CL Tr.").

EXHIBIT 150: Excerpts from the May 13, 2011 deposition of Arieh Spitzen ("Spitzen NW Tr.").

EXHIBIT 151: Excerpts from the August 11 and 12, 2010 deposition of Arieh Spitzen in Strauss, et al. v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf, et al. v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Spitzen CL Tr.").

EXHIBIT 152: December 30, 2010 Expert Report of Dr. Matthew Levitt ("Levitt NW Rep.").

EXHIBIT 153: November 30, 2010 English Expert Report of Arieh Spitzen ("Spitzen NW Rep.").

EXHIBIT 154: Excerpts from Plaintiffs' Response to Defendant Credit Lyonnais, S.A.'s Amended Statement of Material Facts As To Which There

Is No Genuine Issue Pursuant To Local Civil Rule 56.1, dated October 14, 2011 (“CL 56.1 Response”).

EXHIBIT 155: Excerpts from the June 17, 2011 deposition of Wayne Geisser (“Geisser Tr.”).

EXHIBIT 156: Fifth Amended Complaint in Weiss, et al. v. National Westminster Bank, PLC (D.I. 141) (“Weiss Fifth Am. Cmpl.”).

EXHIBIT 157: Complaint in Applebaum, et al. v. National Westminster Bank, PLC (D.I. 1) (“Applebaum Cmpl.”).

EXHIBIT 158: Excerpts from the July 20, 21, and 24, 2011 deposition of Arieh Spitzen in Linde, et al. v. Arab Bank, PLC (Case No. 04-cv-2799) (“Spitzen Arab Bank Tr.”).

EXHIBIT 159: Matthew Levitt, “Better Late Than Never: Keeping USAID Funds out of Terrorist Hands,” Washington Institute for Near East Policy, Policy Watch # 1277 (August 24, 2007).

EXHIBIT 160: Matthew Levitt, “How Not to Fund Hamas: Scrutinize Those Who Receive U.S. Aid,” New York Daily News, February 4, 2009.

EXHIBIT 161: “Enter Hamas: The Challenges of Political Integration,” International Crisis Group Middle East Report No. 49, January 18, 2006.

EXHIBIT 162: Emanuel Schäublin, Role and Governance of Islamic Charitable Institutions: The West Bank Zakat Committees (1977-2009) in the Local Context, Centre on Conflict, Development, and Peacebuilding Working Paper (2009).

EXHIBIT 163: Jeroen Gunning, “Terrorism, charities and diasporas: Contrasting the fundraising practices of Hamas and al Qaeda among Muslims in Europe,” in Countering the Financing of Terrorism (Thomas J. Biersteker & Sue E. Eckert eds., 2008).

EXHIBIT 164: Exhibit 4 to the September 1, 2010 deposition of Dr. Matthew Levitt in Strauss, et al. v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf, et al. v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) (“Levitt CL Dep. Ex. 4”).

EXHIBIT 165: Exhibit 8 to the September 1, 2010 deposition of Dr. Matthew Levitt and certified translation in Strauss, et al. v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf, et al. v. Crédit Lyonnais, S.A. (“Levitt CL Dep. Ex. 8”).

EXHIBIT 166: “Islamic Social Welfare Activism In The Occupied Palestinian Territories: A Legitimate Target?” International Crisis Group Middle East Report No. 13 (April 2, 2003).

EXHIBIT 167: Jonathan Bentham, The Palestinian Zakat Committees 1993-2007 and Their Contested Interpretations, Program for the Study of International Organization Occasional Paper 1/2008, Geneva: Graduate Institute of International and Development Studies.

EXHIBIT 168: Excerpt from June 17, 2010 Supplemental Expert Report of Dr. Matthew Levitt in Strauss, et al. v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf, et al. v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) (“Levitt CL Rep.”).

EXHIBIT 169: Exhibit 7 to the September 1, 2010 deposition of Dr. Matthew Levitt in Strauss, et al. v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf, et al. v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) (“Levitt CL Dep. Ex. 7”).

EXHIBIT 170: Exhibit 4 to the June 2, 2011 deposition of Dr. Matthew Levitt (“Levitt NW Dep. Ex. 4”).

EXHIBIT 171: Exhibit 8 to the June 2, 2011 deposition of Dr. Matthew Levitt (“Levitt NW Dep. Ex. 8”).

EXHIBIT 172: March 4, 2011 Expert Report of Brian Jenkins (“Jenkins NW Rep.”).

EXHIBIT 173: Excerpts from Eli Berman, Radical, Religious, and Violent: The New Economics of Terrorism (Cambridge, MA: MIT Press, 2009).

EXHIBIT 174: Plaintiffs' Responses and Objections to CL's Contention Interrogatories in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914), dated April 11, 2011 (“Plaintiffs' Resp. to CL Cont. Interrog.”).

EXHIBIT 175: Plaintiffs' Supplemental Responses to CL's Contention Interrogatories in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914), dated July 11, 2011 (“Plaintiffs' Supp. Resp. to CL Cont. Interrog.”).

EXHIBIT 176: Excerpts from 31 C.F.R. Appendix A to Chapter V (31 C.F.R. Ch.V, App'x A (2010)).

EXHIBIT 177: Excerpt from Counterterror Initiatives in the Terror Finance Program: Hearings before the Comm. on Banking, Housing, and Urban

Affairs of the U.S. Senate, 108th Cong. 23 (2003) (statement of David D. Aufhauser, General Counsel, U.S. Department of the Treasury) ("Aufhauser Testimony").

EXHIBIT 178: Excerpts from Rashumot publications ("Rashumot Publications").

EXHIBIT 179: December 30, 2010 English Expert Report of Ronni Shaked ("Shaked NW Rep.").

EXHIBIT 180: Excerpts from the November 4, 2010 deposition of Ronni Shaked in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Shaked CL Tr.").

EXHIBIT 181: Exhibits 9A and 9B (certified translation of Ex. 9A) from the November 4, 2010 deposition of Ronni Shaked in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Shaked CL Dep. Exs. 9A and 9B").

EXHIBIT 182: Exhibits 11 and 11A (certified translation of Ex. 11) from the May 3, 2011 deposition of Ronni Shaked ("Shaked NW Dep. Exs. 11 and 11A").

EXHIBIT 183: Excerpts from the May 3, 2011 deposition testimony of Ronni Shaked ("Shaked NW Tr.").

EXHIBIT 184: Exhibits 17A and 17B (certified translation of Ex. 9A) from the November 4, 2010 deposition of Ronni Shaked in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Shaked CL Dep. Exs. 17A and 17B").

EXHIBIT 185: March 3, 2011 Rebuttal Report of Moshe Azoulay ("Azoulay NW Reb. Rep.").

EXHIBIT 186: Annexes B5 and B6 (certified translation of Annex B5) to the Azoulay NW Reb. Rep. and certified translation ("Azoulay NW Reb. Rep., Annexes B5 and B6").

EXHIBIT 187: Excerpts from the December 2 and 3, 2010 deposition of Evan Kohlmann in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Kohlmann CL Tr.").

EXHIBIT 188: Appendix to the Kohlmann Rep., page 336 ("Kohlmann App'x p. 336").

EXHIBIT 189: Annexes B3 and B4 (certified translation of Annex B3) to the Azoulay NW Reb. Rep. and certified translation ("Azoulay NW Reb. Rep., Annexes B3 and B4").

EXHIBIT 190: Annex B2 to the Azoulay NW Reb. Rep. ("Azoulay NW Reb. Rep., Annex B2").

EXHIBIT 191: Exhibits 22A and 22B from the November 4, 2010 deposition of Ronni Shaked in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Shaked CL Dep. Exs. 22A and 22B").

EXHIBIT 192: Copy of website and certified translation of website cited in Shaked NW Rep. n.430, <http://www.pmo.gov.il/PMO/Communication/IsraelUnderAttack/Jerusalem2/Jerusalem.htm>.

EXHIBIT 193: Appendix to the Shaked NW Rep., pages 1076-91 and certified translation ("Shaked NW Rep., App'x 1076-91").\*

EXHIBIT 194: Appendix to the Shaked NW Rep., pages 1019-22 and certified translation ("Shaked NW Rep., App'x 1019-22").\*

EXHIBIT 195: Exhibits 19A and 19B from the November 4, 2010 deposition of Ronni Shaked in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Shaked CL Dep. Exs. 19A and 19B").

EXHIBIT 196: Annex B8 to the Azoulay NW Reb. Rep. and certified translation ("Azoulay NW Reb. Rep., Annex B8").

EXHIBIT 197: Annex B9 to the Azoulay NW Reb. Rep. ("Azoulay NW Reb. Rep., Annex B9").

EXHIBIT 198: Annex B10 to the Azoulay NW Reb. Rep. ("Azoulay NW Reb. Rep., Annex B10").

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\* The certifications of the translations bearing an asterisk reference the page number of the version of the foreign language documents as plaintiffs originally produced them in the lawsuits against Crédit Lyonnais.

EXHIBIT 199: Annex B11 to the Azoulay NW Reb. Rep. ("Azoulay NW Reb. Rep., Annex B11").

EXHIBIT 200: Appendix to the Shaked NW Rep., pages 1066-75 and certified translation ("Shaked Rep., App'x 1066-75").\*

EXHIBIT 201: Copy of website cited in Shaked NW Rep. n.431, [http://www.mfa.gov.il/MFA/MFAArchive/2000\\_-2009/2004/1/Suicide+bombing+of+Egged+bus+no+19+in+Jerusalem+-+.htm](http://www.mfa.gov.il/MFA/MFAArchive/2000_-2009/2004/1/Suicide+bombing+of+Egged+bus+no+19+in+Jerusalem+-+.htm).

EXHIBIT 202: December 8, 2009 English Expert Report of Ronni Shaked ("Shaked CL Rep.").

EXHIBIT 203: October 5, 2010 Supplemental Expert Report of Ronni Shaked With Respect to the March 7, 2003 Attack (Redline) in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Shaked CL 3/7/03 Attack Rep.").

EXHIBIT 204: Exhibits 18A and 18B from the November 4, 2010 deposition of Ronni Shaked in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Shaked CL Dep. Exs. 18A and 18B").

EXHIBIT 205: December 29, 2010 Expert Report of Moshe Azoulay ("Azoulay NW Rep.").

EXHIBIT 206: February 22, 2011 Expert Report of Emanuel Gross ("Gross NW Rep.").

EXHIBIT 207: Excerpts from the September 28, 2010 deposition of Emanuel Gross in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Gross CL Tr.").

EXHIBIT 208: Exhibits 2A and 2B (certified translation of Ex. 2A) from the September 28, 2010 deposition of Emanuel Gross in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Gross CL Dep. Exs. 2A and 2B").

EXHIBIT 209: Exhibits 3A and 3B (certified translation of Ex. 3A) from the September 28, 2010 deposition of Emanuel Gross in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and

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\* The certifications of the translations bearing an asterisk reference the page number of the version of the foreign language documents as plaintiffs originally produced them in the lawsuits against Crédit Lyonnais.

Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Gross CL Dep. Exs. 3A and 3B").

EXHIBIT 210: September 8, 2009 Expert Report of Evan Kohlmann ("Kohlmann Rep.").

EXHIBIT 211: Exhibit 1 to the Kohlmann Rep. ("Kohlmann Rep. Ex. 1").

EXHIBIT 212: Exhibit 9 to the Kohlmann deposition in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Kohlmann CL Dep. Ex. 9").

EXHIBIT 213: Exhibit 5 to the Kohlmann deposition in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Kohlmann CL Dep. Ex. 5").

EXHIBIT 214: Exhibit 11 to the Kohlmann deposition in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Kohlmann CL Dep. Ex. 11").

EXHIBIT 215: Exhibit 12 to the Kohlmann deposition in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Kohlmann CL Dep. Ex. 12").

EXHIBIT 216: Exhibit 13 to the Kohlmann deposition in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Kohlmann CL Dep. Ex. 13").

EXHIBIT 217: Exhibit 14 to the Kohlmann deposition in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Kohlmann CL Dep. Ex. 14").

EXHIBIT 218: Exhibits 18 and 19 (translation of Ex. 18) to the Kohlmann deposition in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Kohlmann CL Dep. Exs. 18 and 19").

EXHIBIT 219: Annex B7 to the Azoulay NW Reb. Rep. ("Azoulay NW Reb. Rep., Annex B7").

EXHIBIT 220: Exhibit A to the Jenkins NW Rep. ("Jenkins NW Rep. Ex. A").

EXHIBIT 221: Exhibit B to the Jenkins NW Rep. ("Jenkins NW Rep. Ex. B").

EXHIBIT 222: December 29, 2010 Expert Report of Shaul Naim ("Naim NW Rep.").

EXHIBIT 223: Excerpts from the October 6, 2010 deposition of Shaul Naim in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Naim CL Tr.").

EXHIBIT 224: April 14, 2011 Supplemental Rebuttal Report of Moshe Azoulay ("Azoulay NW Supp. Reb. Rep.").

EXHIBIT 225: Exhibits 7 and 7A (certified translation of Ex. 7) from the May 26, 2011 deposition of Shaul Naim ("Naim NW Dep Exs. 7 and 7A").

EXHIBIT 226: Excerpts from the May 26, 2011 deposition of Shaul Naim ("Naim NW Tr.").

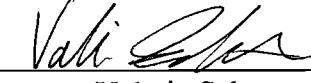
EXHIBIT 227: December 10, 2009 Expert Report of Shaul Naim in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Naim CL Rep.").

EXHIBIT 228: January 12, 2010 Supplemental Expert Report of Shaul Naim in Strauss v. Crédit Lyonnais, S.A. (Case No. 06-cv-702) and Wolf v. Crédit Lyonnais, S.A. (Case No. 07-cv-914) ("Naim CL. Supp. Rep.").

EXHIBIT 229: Annex A to the Azoulay NW Rep. ("Azoulay NW Rep., Annex A").

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
December 7, 2011

  
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Valerie Schuster